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July 10, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184*

Dear Ms. Salas:

In response to requests from Ms. Attwood and the CCB staff, Verizon is providing the enclosed. Please let me know if you have any questions.

Sincerely,

Enclosure

cc: R. Tanner  
K. Farroba  
B. Olson  
M. Carey  
A. Johns  
S. Pie

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July 10, 2001

Ms. Dorothy Attwood  
Chief, Common Carrier Bureau  
Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20544

Dear Ms. Attwood:

I am writing to seek the Commission's concurrence for Verizon Pennsylvania Inc. (Verizon) and Verizon Advanced Data Inc. (VADI) to cooperate to provide DSL service for resale over resold voice lines in the former Bell Atlantic service areas in Pennsylvania before the scheduled sunset of the advanced services affiliate requirement in the Bell Atlantic-GTE merger order.<sup>1</sup>

This request is very narrow and would promote the public interest by providing a new option for the provision of advanced services, thereby potentially furthering the deployment of advanced services.

Although neither Verizon nor its separate data affiliate, VADI, has an existing legal obligation to make DSL service available for resale where another carrier provides the voice service on that line, Verizon voluntarily plans to introduce a new service offering that will allow a reseller to resell VADI's DSL service in the former Bell Atlantic service areas over lines in Pennsylvania on which that same reseller currently provides resold voice service. That new service would be provided pursuant to an amendment to VADI's federal tariff. Verizon provided an illustrative tariff for this service in connection with its pending section 271 application for Connecticut on July 6, 2001 in Docket No. 01-100 and again on July 9, 2001 in Docket No. 01-138 in connection with a letter explaining the new service's roll out in the former Bell Atlantic service areas in Pennsylvania. As described more specifically in the July 9<sup>th</sup> letter, a reseller of Verizon's voice service will be able to offer its end users resold DSL on lines where it currently resells Verizon's voice service. This is an interim arrangement until a more permanent arrangement can be developed through collaboratives and the change management process.

In order to provision a reseller's order to resell VADI's DSL over the same line on which the reseller currently resells Verizon's voice service, VADI and Verizon will need access to each other's systems and data. In order to coordinate the provision of voice service and DSL for

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<sup>1</sup> *GTE Corp.*, 15 FCC Rcd 14032, App. D (2000) ("Merger Conditions").

resale over the same line and to plan and coordinate a cooperative production trial for the new service, Verizon and VADI will need to interact in ways that arguably are prohibited by the Merger Conditions. Verizon, therefore, seeks both a permanent waiver of the Merger Conditions in order to provide this service, and Special Temporary Authority immediately to take any and all steps as may be necessary in order to successfully provision the resale of VADI's DSL service on a line on which a reseller is currently reselling Verizon's voice service.

Granting both a permanent waiver and the Special Temporary Authority in order to allow Verizon and VADI to coordinate to provide this service is strongly in the public interest. First, it will allow Verizon voluntarily to provide a new service to its wholesale customers so that they can provide both resold voice and DSL service to their end user customers. Second, it offers end users a new option for obtaining advanced services, potentially promoting the widespread deployment of advanced services. Third, it will give Verizon and resellers an opportunity to gain experience provisioning resold DSL service over resold voice lines as part of an interim arrangement. Verizon technical personnel would be pleased to discuss the technical aspects of provisioning resellers' orders to resell VADI's DSL over resold Verizon voice loops with you or your staff in more detail.

If you have any questions, please give me a call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dee May".

cc: R. Tanner  
K. Farroba  
B. Olson  
M. Carey  
A. Johns  
S. Pie